

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA

IN RE: MERCY HOSPITAL, IOWA CITY, IOWA, <i>et al.</i> , Debtors.	Chapter 11 Bankruptcy Case No. 23-00623 SECOND MOTION TO EXTEND TIME TO OBJECT TO GENERAL UN-SECURED NON-PRIORITY CLAIMS
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COMES NOW Dan R. Childers, in his sole capacity as Trustee of the Mercy Hospital Liquidation Trust (“Trustee”), by and through his counsel, and in support of this Motion respectfully states:

1. Pursuant to the terms of the Confirmed Plan as well as the Liquidation Trust Agreement, the Trustee was vested with the responsibility to review and allow or disallow and to object to the various General Un-secured Non-Priority Claims (“GUNC”) filed with Epiq Corporate Restructuring, LLC (“Epiq”).
2. Pursuant to an Order enrolled by this Court (Dkt #1267), the Trust was given through and including January 20, 2025 to lodge objections against any GUNC.
3. Approximately 800 total GUNCs were filed with Epiq. The Trustee’s professionals have built a tracking EXCEL spreadsheet. Among the various GUNCs filed to date, many were filed by the Debtors’ former employees, *i.e.* various pensioners.
4. The Trustee is considering filing a Motion to enable the appointment of a Board Member and a Committee who will work with counsel for the pensioners and with Agilis (an advisory firm specializing in, *inter alia*, pension issues) with respect to pension administration. If and when that Motion is filed, and if the relief requested in that to-be-filed Motion is granted, the treatment of the various pensioners’ GUNC might be affected.

5. As such, pending resolution of the to-be-filed Motion re pension issues, the deadline for the Trustee to object to GUNC should be further extended to and including March 24, 2025, *i.e.* approximately 60 days hence.

6. An extension for another 60 days will not unduly prejudice the GUNC holders, because the Trustee's administration of the Trust will extend for many more months, in light of various issues such as the pendency of an appeal from this Court's confirmation order, as well as the need to evaluate and pursue preferences, etc.

WHEREFORE, the Trustee respectfully prays this Court enter and enroll an Order granting the Trustee through and including March 24, 2025 to object to GUNC and for such other relief as may be just and proper under the premises.

/s/ Eric W. Lam

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ATTORNEY FOR LIQUIDATION TRUSTEE

Certificate of Service

The undersigned certifies, under penalty of perjury, that on this 16th day of January, 2025, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case.

/s/ Kelly Carmichael